

FILED  
2021 MAY 27 AM 10:39  
CLERK  
U.S. DISTRICT COURT

ANDREA T. MARTINEZ, Acting United States Attorney (#7527)  
KARIN M. FOJTIK, Assistant United States Attorney (#7527)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682

KAYLYNN FOULON, Trial Attorney, State of Florida Bar (#0085397)  
U.S. Department of Justice  
Criminal Division  
Child Exploitation and Obscenity Section  
1301 New York Ave., NW, 11<sup>th</sup> Floor  
Washington, D.C. 20530  
Email: Kaylynn.foulon@crim.usdoj.gov

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

---

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>vs.</p> <p>LANDON GERMAINE,</p> <p>Defendant.</p>	<p><u>INFORMATION</u></p> <p>Count 1: 18 U.S.C. § 2251(a) and (e), Production of Child Pornography;</p> <p>Count 2: 18 U.S.C. § 2422(b), Coercion and Enticement</p> <p>Case: 1:21-cr-00071 Assigned To : Waddoups, Clark Assign. Date : 05/27/2021 Description: USA v Germaine</p>
---	---

---

The Acting United States Attorney charges:

COUNT 1  
18 U.S.C. § 2251(a) and (e)  
(Production of Child Pornography)

On a date unknown, continuing through May 22, 2020, in the District of Utah and  
elsewhere,

LANDON GERMAINE,

defendant herein, did knowingly employ, use, persuade, induce, entice and coerce minors, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and attempted to do so, and did aid and abet therein; all in violation of 18 U.S.C. § 2251(a) and (e) and 18 U.S.C. § 2.

COUNT 2

18 U.S.C. § 2422(b)  
(Coercion and Enticement)

On a date unknown continuing through May 22, 2020, in the District of Utah and elsewhere,

LANDON GERMAINE,

defendant herein, using a facility or means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce individuals who have not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, and attempted to do so, and did aid and abet therein; all in violation of

18 U.S.C. § 2422(b) and 18 U.S.C. § 2.

ANDREA T. MARTINEZ  
Acting United States Attorney

*/S/ Karin M. Fojtik*

---

KARIN M. FOJTIK  
Assistant United States Attorney